

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

Students for Life of America, et al.,

Plaintiffs,

v.

Ann Gillespie, in her official capacity as director of the Illinois Department of Insurance,

Defendant.

Case No. 1:24-cv-11928

Judge Jeffrey I. Cummings

**NOTICE OF WITHDRAWAL OF PLAINTIFFS**

Plaintiffs Innovator Capital Management LLC and John Southard are withdrawing from this lawsuit effective immediately. Because Claim No. 6 in the second amended complaint was raised only by Innovator, the plaintiffs are withdrawing that claim as none of the remaining plaintiff have standing to assert it. *See* Second Amended Complaint, ECF No. 19, at ¶¶ 199–203.

Respectfully submitted.

THOMAS BREJCHA  
PETER BREEN  
Thomas More Society  
309 West Washington Street, Suite 1250  
Chicago, Illinois 60606  
(312) 782-1680 (phone)  
(312) 782-1887 (fax)  
info@thomasmoresociety.org

/s/ Jonathan F. Mitchell  
JONATHAN F. MITCHELL  
Mitchell Law PLLC  
111 Congress Avenue, Suite 400  
Austin, Texas 78701  
(512) 686-3940 (phone)  
(512) 686-3941 (fax)  
jonathan@mitchell.law

Dated: October 13, 2025

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I certify that on October 13, 2025, I served this document through CM/ECF upon:

ELIZABETH MORRIS  
SARAH J. GALLO  
ALICE L. RIECHERS  
ELENA S. METH  
Office of the Illinois Attorney General  
Special Litigation Bureau  
115 South LaSalle Street, 35th Floor  
Chicago, Illinois 60603  
(312) 814-3000  
elizabeth.morris@ilag.gov  
sarah.gallo@ilag.gov  
alice.riechers@ilag.gov  
elena.meth@ilag.gov

*Counsel for Defendants*

/s/ Jonathan F. Mitchell  
JONATHAN F. MITCHELL  
*Counsel for Plaintiffs*